

Message

From: Kevin Gauthier [KGauthier@hauthaway.com]
Sent: 8/30/2018 8:06:26 PM
To: Muneer, Alie [muneer.alie@epa.gov]
CC: Christopher Reuther [creuther@hauthaway.com]
Subject: P-18-0169 PPE question
Attachments: Sigma-Aldrich SDS.pdf

Hello Alie,

As we discussed, I am forwarding comments from our Environmental, Health and Safety Manager. It would be best to contact Chris directly if all the concerns are not addressed. I have attached the Sigma Aldrich SDS that he refers to below.

Regards,

Kevin Gauthier
Technical Director
Hauthaway
638 Summer St.
Lynn, MA 01905
781-592-6444

From: Christopher Reuther
Sent: Thursday, August 30, 2018 3:47 PM
To: Kevin Gauthier <KGauthier@hauthaway.com>
Subject: PPE Follow up Question

Good Afternoon Kevin,

I wanted to respond to your inquiry about using an air purifying respirator, and fit testing employees to provide an APF of 50 for the addition of pentaerythritol tetraacrylate to a vessel through a spigot attached to a drum. After reviewing the hazards of the chemical on various safety data sheets I do not find it necessary to require our employees to wear an APR with an APF of 50 based on the hazard data and the similarities to other chemicals. If you review the Sigma Aldrich SDS for PPE it makes some basic recommendations for PPE which we are already doing per OSHA and chemical handling. Aside from this, with no PEL being indicated by OSHA and no REL by NIOSH there is no real guide as to what type of protection would be necessary and an APF of 10 could be more than adequate if we needed to do so. Please let me know if this clarifies things a bit more and if there are any further questions please let me know.

Thanks,

Chris

Christopher Reuther
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